

Comments on the Fourth Exposure Draft of the Proposed Actuarial Standard on Modeling

May 15, 2019

The Actuarial Standards Board

The American Retirement Association (ARA) and the ASPPA College of Pension Actuaries (ACOPA) appreciates this opportunity to comment on the fourth exposure draft of the Actuarial Standard of Practice (ASOP) on *Modeling*.

ARA is a national organization of more than 26,000 retirement plan professionals who provide consulting and administrative services for qualified retirement plans covering millions of American workers. ARA members are retirement professionals of all disciplines, including consultants, investment professionals, administrators, actuaries, accountants and attorneys. All credentialed actuarial members of ARA are members of ACOPA, which has primary responsibility for the content of comment letters that involve actuarial issues. These are ACOPA's comments on the proposed actuarial standard of practice on Modeling:

1. The revisions to the draft from the prior drafts have greatly improved the standard.
2. The definition of "Model" is too broad. The definition could be interpreted to include any actuarial service other than individual benefit calculations. The definition should also describe what is not a model, such as nondiscrimination testing.

This letter was prepared by the ASOP Task Force of the ACOPA Professionalism Committee, Lynn Young, Chair. If you have any questions, please contact Martin Pippins, Executive Director of ACOPA, at (703) 516-9300 ext. 146.

Thank you for your consideration of these comments.

Sincerely,

/s/
Lynn Young, MSPA,
Chair ASOP Task Force

/s/
Martin L. Pippins, MSPA,
Executive Director
ASPPA College of Pension Actuaries

/s/
John Markley, FSPA, President
ASPPA College of Pension Actuaries

/s/
Lauren Okum, MSPA, President-Elect
ASPPA College of Pension Actuaries